

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x  
:  
UNITED STATES OF AMERICA :  
:  
- v. - : NOTICE OF MOTION FOR  
\$717,200,000 IN UNITED STATES CURRENCY, : ENTRY OF A DEFAULT  
Defendant-in-rem. : JUDGMENT  
:  
----- x : 18 Civ. 10783 (ALC)

PLEASE TAKE NOTICE that upon the Motion for Entry of Default Judgment; upon the Declaration of Assistant United States Attorney Benet Kearney, dated February 14, 2019; upon the Clerk's Certification of default; and upon all prior proceedings herein; the plaintiff, the United States of America, by and through its attorney, Geoffrey S. Berman, United States Attorney for the Southern District of New York, hereby moves before the Honorable Andrew L. Carter Jr., United States District Judge, United States Courthouse, 40 Foley Square, New York, New York 10007, on submission, for an order pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure granting default judgment in favor of the plaintiff, United States of America, and forfeiting the following Defendant-in-rem to the United States of America:

- a) \$717,200,000 in United States currency.

No previous request for the relief sought herein has been made.

Dated: New York, New York  
February 14, 2019

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

By: /s/ Benet Kearney  
Benet Kearney  
Assistant U.S. Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
Tel.: (212) 637-2260